

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Laura Lee Hagenauer,

Debtor in Possession.

Case No. 14-63530-fra11

**NOTICE OF INTENT AND HEARING
RE MOTION TO APPROVE (A) SALE
OF REAL PROPERTY FREE AND
CLEAR OF LIENS, CLAIMS,
ENCUMBRANCES AND INTERESTS;
(B) ENTRY INTO REAL PROPERTY
LEASE; AND (C) COMPENSATION TO
REAL ESTATE BROKER**

PLEASE TAKE NOTICE THAT Laura Lee Hagenauer (the “**Debtor**”), has filed a motion (the “**Motion**”) for authority to sell (the “**Sale**”) the commercial real property and fixtures located at 3071 Schmidt Lane, Hubbard, Oregon (the “**Property**”) to R&R Property Holdings, Inc. (“**R&R**”) or a higher and better bidder, free and clear of all liens, claims, encumbrances and interests pursuant to 11 U.S.C. §§ 363(b) and (f); enter into a lease of a portion of the Property (the “**Property Lease**”) pursuant to 11 U.S.C. § 363(b); and pay a 4% commission to Coldwell Banker Commercial of Salem, Oregon (the “**Broker**”) upon the closing of the Sale of the Property pursuant to Bankruptcy Rule 2016(a) and Local Rule 2016-1(c)(2)(A) & (B).

A hearing on the Motion and any objections to the Motion will be held on November 4, 2015 at 10:00 a.m. (the “**Hearing**”) and testimony will be offered, and received if admissible, in support of the Motion and a finding that the purchase of the Property by R&R is being made in good faith and is entitled to the protections afforded by 11 U.S.C. § 363(m).

Debtor may be contacted through her attorney Ted A. Troutman at 503-292-6788 or tedtroutman@gmail.com

If you wish to object to any aspect of the Motion or requested relief and findings, you must (1) attend the Hearing and (2) within 23 days of the later of either (a) the date next to the signature below; or (b) the service date in ¶ 17 below, file with the Clerk of the Court, 405 East 8th Avenue #2600, Eugene, Oregon 97401: (i) a written response stating the specific facts upon which the objection is based, and (ii) proof that a copy of the response was served upon the Debtor and R&R.

This document shall constitute the notice required by Local Bankruptcy Rule 2002-1.

1. Debtor proposes to sell the Property free and clear of liens, claims, encumbrances and interests pursuant to 11 U.S.C. § 363(f)(2) and (f)(5) (and 11 U.S.C. § 363(f)(1), if applicable)

and the terms of Standard Commercial Sale Agreement between the Debtor and R&R dated September 29, 2015 (the “**Sale Agreement**”). A copy of the Sale Agreement is attached to the Motion. Debtor also proposes to enter into the Property Lease to lease back a portion of the Property for use in her business operations. A copy of the Property Lease is attached to the Motion.

2. R&R, the proposed buyer, is a Washington corporation and an affiliate of Cascadia Metals, Inc. (“**Cascadia**”). Cascadia is a primary vendor to the Debtor, one of the Debtor’s largest unsecured and administrative creditors, and the holder of a lien against the Property. If the sale is approved, R&R also will become the Debtor’s landlord under the proposed Property Lease. R&R’s counsel is Brandy A. Sargent, Stoel Rives LLP, 900 S.W. Fifth Avenues, #2600, Portland, Oregon, 97204; Telephone: 503-294-9888; E-mail: brandy.sargent@stoel.com.

3. The address of the Property is 3071 Schmidt Lane, Hubbard, Oregon. The legal description of the Property is:

A tract of land in the Southeast Quarter of Section 33, Township 4 South, Range 1 West, Willamette Meridian, Marion County, Oregon, being a portion of that tract of land described by Warranty Deed from Gregory G. Berning to PSL, LLC and recorded in Reel 2760, Page 114, Marion County Deed Records, more particularly described as follows:

Beginning at an iron bar that is on record as being North 86° 15' East 1,611.06 feet and South 31° 26' West 1,351.88 feet and North 58° 34' West 641.52 feet from the Northwest corner of the Ewing Purvine Donation Land Claim in Section 33, Township 4 South, Range 1 West of the Willamette Meridian in Marion County, Oregon, which is at an angle point of the Northerly margin of Schmidt Lane (CR 439, 40.00 foot wide) and also being the most Southerly corner of that tract of land deeded to S.W. WEAVER, by Deed recorded in Volume 178, Page 461, Deed Records; thence North 41° 16' 23" East 402.16 feet to the Northwest corner of Parcel 1 of said PSL, LLC deed (Paragraph 1); thence along the center of a ditch South 24° 17' 19" East 121.03 feet to an Iron pipe; thence South 49° 47' 19" East 110.55 feet to an iron rod; thence South 41° 35' 19" East 198.66 feet to an iron rod; thence South 58° 33' 19" East 137.23 feet to the Westerly margin of Relocated (1932) Highway 99E (40 feet from centerline); thence South 31° 19' 58" West 249.82 feet along the Westerly margin of said Highway 99E to its intersection with the North line of County Road No. 439; thence North 58° 53' 01" West 605.67 feet along the North right of way line of said Schmidt Lane (20 feet from centerline) to the point of beginning, in the City of Hubbard, Marion County, Oregon.

4. A copy of the full property description or inventory may be examined or obtained by contacting counsel for the Debtor.

5. The Property may be viewed by contacting the Debtor’s counsel.

6. Other than the Debtor, R&R and the Broker, there are no other parties to the transaction.

7. Under the Sale Agreement, the gross sale price for the Property is \$2,600,000. All of the liens on the Property exceed \$4,469,734, of which Debtor believes a total of \$2,050,033.08 need not be paid as secured claims because they have either consented or the Court can order the

sale under Section 363(f)(5). KeyBank also seeks reimbursement of approximately \$70,000 for fees and costs. Total sales costs will include a 4% commission to the Broker (*i.e.*, \$104,000, assuming no change to the terms of the Sale) and other costs of closing, estimated to be approximately \$6,299.00. A preliminary list of closing costs to be satisfied by the Debtor may be obtained from the Debtor's counsel. All tax consequences have been considered and no taxes will be owed as a result of the sale. Absent a substantial overbid for the Property, the Sale will result in no net proceeds to the estate after payment of the Sale proceeds to satisfy valid liens on the Property (in the order of their priority) and fees, costs, and taxes payable in connection with the Sale.

8. The Sale is not of substantially all of the Debtor's assets. Debtor will continue to own and operate her business after the Sale. The terms of the Sale are:

(a) sale price of \$2,600,000; (b) earnest money deposit of \$25,000; (c) a contingency period of up to 45 days after the opening of escrow during which R&R will proceed to satisfy itself as to the condition of the Property, environmental matters, and other matters (d) a title review period of 15 days after receipt of a title report; (e) a contingency for Bankruptcy Court approval; and (f) a period of 15 days after satisfaction of contingencies for R&R to close the Sale. In the event that R&R is not the successful purchaser of the Property, the costs of any environmental assessment will be borne by the Debtor.

If R&R is the successful purchaser of the Property, it will lease a portion of the Property back to the Debtor pursuant to the Property Lease. In summary, the Property Lease would commence at the closing of the Sale and continue for an initial period of 12 full calendar months, and thereafter be a year-to-year lease. Either party can terminate the Lease on 90 days' notice at the end of the initial term or any renewal term. For the initial term, the monthly rent would be a "gross rental" of \$15,000 per month, inclusive of monthly base rent of \$12,650 and Debtor's proportionate share of property taxes (estimated at \$1,916.67 per month) and property insurance costs (estimated at \$433.34 per month). After the first year, unless the Property Lease is terminated, the rent becomes "triple net," and Debtor would pay her proportionate share of property taxes, property insurance and maintenance costs. Debtor is responsible for utilities that she uses. At the start of the Property Lease, Debtor would pay the first month's rent (\$15,000) and a security deposit equal to \$15,000 (which would be refundable at the end of the Property Lease, unless applied to cure a breach of the Lease).

9. The Property has been publicly marketed since May 2015 and the offer received from R&R is the highest and best offer received after competitive bidding. No further auction is proposed, but the Sale is expressly subject to overbid prior to the Hearing pursuant to an agreement on the same or better terms and conditions (apart from the purchase price) as the Sale Agreement, including, without limitation, the Property Lease. Competing bids must be submitted to the Debtor no later than 4:00 p.m. on October 23, 2015.

10. Based on a November 2014 appraisal of the Property for \$3,800,000, the Property was initially listed for sale for \$3,775,000. In September 2015, Debtor received an offer of \$2,300,000 for the Property and countered at \$3,175,000. In response, the offer was raised to \$2,400,000. Around the same time, R&R made its \$2,600,000 offer for the Property, which the

Debtor countered at \$3,175,000. R&R did not raise its offer, and the Broker has not received any other formal offers for the Property.¹

11. Debtor's primary secured creditor, KeyBank, National Association ("KeyBank"), previously filed a motion for relief from the automatic stay to begin the foreclosure process against the Property. Pursuant to a stipulated order resolving that motion, the Property was listed for sale and, in the event the Property was not sold and the Debtor had not confirmed a plan of reorganization by October 1, 2015, KeyBank was to be allowed to pursue foreclosure. Debtor believes that the proceeds of the Property that would be generated in a foreclosure would not exceed the amount to be received in the proposed Sale. Additionally, the offer received from R&R is coupled with the Property Lease, which will allow the Debtor to lease a portion of the Property and avoid moving costs.

12. The Debtor is proposing the sale in advance of confirmation of a plan because through the sale and leaseback debtor will be able to reduce her monthly expenses and propose a feasible plan. If the sale is not allowed KeyBank could proceed with its foreclosure proceeding.

13. Lienholders: Based on filed proofs of claim, the following creditors claim liens on the Property (including security interests in fixtures, collectively, the "Liens"), in the following amounts and order of priority:²

Creditor	Lien Claim	Total Liens
Marion County Assessor's Office (Prop. Taxes)	\$ 131,680.15	\$ 131,680.15
KeyBank National Association	\$1,622,645.00	\$1,754,325.15
US Small Business Administration	\$ 860,448.55	\$2,614,773.70
Oregon Business Development Corporation	\$ 706,588.97	\$3,321,362.67
Cascadia Metals Inc.	\$ 634,357.58	\$3,955,720.25
Internal Revenue Service – tax lien	\$ 514,014.53	\$4,469,734.78

14. Other than costs of the Sale, no Liens are intended to be paid without further order of the Bankruptcy Court. All of the Liens shall attach to the Sale proceeds in the same order of priority as they attached to the Property. Any Sale proceeds remaining after paying the Liens and expenses, taxes, commissions, fees, costs or other charges as provided in the Motion shall be held in trust until the Court orders payment. At this time, no such excess Sale proceeds are anticipated.

15. The Court appointed the Broker on May 6, 2015. Pursuant to that order, the Broker is proposed to be paid a 4% commission, which will be equal to \$104,000 if the Sale to R&R is approved and closes.

16. A Hearing on the Motion and any objections to the Motion will be held on November 4, 2015 at 10:00 a.m. in Courtroom 6 of the U.S. Bankruptcy Court, 405 E. 8th Ave.,

¹ The Debtor also received an informal offer of \$2,000,000, but the party making the informal offer never wrote-up a formal offer.

² Addresses for service on such parties are set forth in the Certificate of Service for this Notice and the Motion.

Eugene, Oregon, 97401, and testimony will be offered, and received if admissible, in support of the Motion and a finding that the purchase of the Property by R&R is being made in good faith and is entitled to the protections afforded by 11 U.S.C. § 363(m).

17. I certify that on October 7, 2015 a copy of this document was served, pursuant to FRBP 7004, on the U.S. Trustee, each named Lien holder at the address set forth on the Certificate of Service accompanying the Motion, the Creditors' Committee Chairperson, and their respective attorneys; and that a copy was also served on that date, pursuant to FRBP 2002(a), on all creditors and parties requesting special notice as listed in the Court's records obtained on October 7, 2015, a copy of which is attached to the original document filed with the Court.

18. For further information contact the Debtor's counsel listed below.

DATED: October 7, 2015.

TROUTMAN LAW FIRM, P.C.

/s/ Ted A. Troutman

Ted A. Troutman, OSB No. 844470
5075 Griffith Drive, Suite 220
Beaverton, OR 97006
Telephone: (503) 292-6788
Facsimile: (503) 596-2371

Ted A. Troutman, OSB #844470
Troutman Law Firm, PC
5075 SW Griffith Dr., Ste 220
Beaverton, OR 97005
(503) 292-6788
tedtroutman@sbcglobal.net

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON**

In Re)
) Case No. 14-63530-fra11
Laura L. Hagenauer,)
)
)
) **CERTIFICATE OF SERVICE**
)

I, Lisette Barajas, Declare as follow:

I certify that on **October 7, 2015** I served, by **first class mail**, a full and true copy of the foregoing **Notice of Intent and Hearing Re Motion to Approve: (A) Sale of Real Property Free and Clear of Liens, Claims, Encumbrances and Interests; (B) Entry Into Real Property Lease; and (C) Compensation to Real Estate Broker and Certificate of Service** on the following by causing a copy thereof to be placed in a sealed envelope, postage prepaid, addressed as shown below, in the U.S. Mail at Beaverton, Oregon on the date indicated below:

“See Attached Matrix”

Tom Rohlfig
Marion County Tax Assessor
555 Court St. NE, Suite 2233
Salem OR 97301

SBA – Portland District Office
Attn: Caron Doss, District Director
601 SW 2nd Ave., Suite 950
Portland OR 97204-3154

Suzanne C. Pickgrobe
US Small Business Administration
601 SW 2nd Ave., Suite 950
Portland OR 97204-3154

State of Oregon
Business Development Department
Attn: Terry Hegle, Business Finance
Officer
775 Summer St. NE Suite 200
Salem OR 97301-1280

State of Oregon
Business Development Department
Attn: Tim McCabe, Director
775 Summer St. NE Suite 200
Salem OR 97301-1280

State of Oregon
Business Development Department
Attn: Carolyn G. Wade
DOJ Civil Enf. Civil Recovery
1162 Court St. NE
Salem OR 97301

Attorney General of the US
c/o Loretta Lynch, Department of
Justice
10th & Constitution NW
Washington DC 20530

Cascadia Metals, Inc.
Attn: Michael Linn, RA
9525 SW Commerce Circle
Wilsonville OR 97070

US Attorney for the District of Oregon
c/o Billy J. Williams, US Attorney
1000 SW 3rd Ave., Suite 600
Portland OR 97204

Brandy A. Sargent
Stoel Rives LLP
900 SW Fifth Ave., Suite 2600
Portland OR 97204

Oregon Department of Justice
c/o Ellen Rosenblum, Attorney
General
1162 Court Street NE
Salem OR 97301

I certify that on **October 7, 2015** I served, by **first class mail**, a full and true copy of the foregoing **Notice of Intent and Hearing Re Motion to Approve: (A) Sale of Real Property Free and Clear of Liens, Claims, Encumbrances and Interests; (B) Entry Into Real Property Lease; and (C) Compensation to Real Estate Broker and Certificate of Service** on the following by causing a copy thereof to be placed in a sealed envelope, postage prepaid, addressed as shown below, in the U.S. Mail at Beaverton, Oregon on the date indicated below:

KeyBank National Association
Attn: Ronald W. Goss, Corporate Council
1101 Pacific Avenue, Lower Level
Tacoma WA 98402

Dated: October 7, 2015

/s/ Lisette Barajas
Lisette Barajas, Legal Assistant to
Ted A. Troutman

Label Matrix for local noticing

0979-6

Case 14-63530-fra11

District of Oregon

Eugene

Wed Oct 7 21:06:51 PDT 2015

DAVID ANDERSON

Schwabe, Williamson & Wyatt, PC

1211 SW Fifth Avenue, Suite 1500-1900

Portland, OR 97204-3795

JOHN D ALBERT

Sherman Sherman Johnnie & Hoyt

PO BOX 2247

Salem, OR 97308-2247

AMCI

POB 8205

Spokane, WA 99203-0205

Artis

3323 Chinden Blvd.

Boise, ID 83714-6638

Associated Management Consultants, Inc. (AMC

P.O. Box 8205

Spokane, WA 99203-0205

Associated Management Consultants, Inc. dba

C/O Keith A. Trefry

Paine Hamblen LLP

717 W Sprague Ave

Ste 1200

Spokane, WA 99201-3905

Atlas Bolt & Screw

POB 96113

Chicago, IL 60693-6113

Atlas Bolt & Screw Co., LLC

1628 Troy Road

Ashland, OH 44805-1398

KATHLEEN LOUISE BICKERS

United States Attorneys Office

1000 SW 3rd Avenue, Suite 600

Portland, OR 97204-2936

(p)BANK OF AMERICA

PO BOX 982238

EL PASO TX 79998-2238

Bruce Kahler

921 Chemawa Rd NE

Keizer OR 97303-3715

Cannonball HNP, LLC

555 Lawton Ave.

Beloit, WI 53511-5441

Cascadia Metals

C/O Michael Linn, RA

9525 SW Commerce Circle

Wilsonville, OR 97070-8407

Cascadia Metals, Inc

7 International Way

Longview, WA 98632-1020

Cascadia Metals, Inc.

c/o Brandy Sargent

900 SW 5th Avenue

Suite 2600

Portland, OR 97204-1229

Cascadia Metals, Inc.

c/o Stoel Rives LLP Attn: Brandy A Sarge

900 SW 5th Ave #2600

Portland, OR 97204-1229

Champion

POB 1624

Woodinville, WA 98072-1624

Champion Metal of Washington Inc.

PO Box 1624

Woodinville, WA 98072-1624

Champion Metal of Washington, Inc.

c/o John DeVore

P. O. Box 1624

Woodinville, WA 98072-1624

Chase

POB 94014

Palatine, IL 60094-4014

CitiBank

POB 6235

Sioux Falls, SD 57117-6235

DeLAMMC, LLC

1129 Belle Passi Rd. NE

Woodburn, OR 97071-5709

Dennis Hagenauer

1129 Belle Passi Rd.

Woodburn, OR 97071-5709

Dennis J. Hagenauer

1129 Belle Passi Rd.

Woodburn, OR 97071-5709

Discover Bank

DB Servicing Corporation

PO Box 3025

New Albany, OH 43054-3025

(p)DISCOVER FINANCIAL SERVICES LLC

PO BOX 3025

NEW ALBANY OH 43054-3025

SCOTT D FINK

Weltman Weinberg & Reis Co

323 W Lakeside Ave #200

Cleveland, OH 44113-1009

Fora Financial Business Loans, LLC
C/O Dan Smith, President
242 W. 36th Street, 14th Floor
New York, NY 10018-7542

Ford Motor Credit Company, LLC
C/O CT Corporation System, RA
388 State Street, Suite 420
Salem, OR 97301-3581

RONALD W GOSS
1101 Pacific Ave
Tacoma, WA 98402-4392

Green Tree Servicing LLC
C/O Malcolm Cisneros
2112 Business Center Drive
Irvine, CA 92612-7135

Green Tree Servicing, LLC
C/O CT Corporation System, RA
388 State St. Suite 420
Salem, OR 97301-3581

HOME 123 CORPORATION
Green Tree Servicing LLC
PO BOX 6154
Rapid City, SD 57709-6154

Laura Lee Hagenauer
3071 Schmidt Ln NE
Hubbard, OR 97032-9806

Paul Harrison
Harrison Management Company
POB 80096
Portland, OR 97280-1096

ISS West
801 Second Ave., Suite 1108
Seattle, WA 98104-1524

ISS West, Inc.
Yoshio Nakamura
801 2nd Ave # 1108
Seattle, WA 98104-1524

Internal Revenue Service
Centralized Insolvency Operations
POB 7346
Philadelphia, PA 19101-7346

Tiffany Jones
Coldwell Banker Commercial
960 Liberty St SE #250
Salem, OR 97302-4197

Joseph N. Argentina, Jr.
Drinker Biddle & Reath LLP
One Logan Square, Ste. 2000
Philadelphia, PA 19103-6996

Keith A. Trefry
PAINE HAMBLEN
717 W. Sprague Avenue
Suite 1200
Spokane, WA 99201-3505

Key Bank
POB 94932
Cleveland, OH 44101-4932

Key Bank National Association
C/O Christopher Gorman, CEO
127 Public Square
Cleveland, OH 44114-1226

KeyBank
1101 Pacific Avenue
Tacoma, wa 98402-4392

KeyBank N.A.
Weltman Weinberg & Reis Co LPA
323 W Lakeside Ave #200
Cleveland, OH 44113-1009

KeyBank National Association
Attention: Ronald Goss
1101 Pacific Avenue
Tacoma, WA 98402-4392

GARRETT SHEA LEDGERWOOD
Hershner Hunter LLP
180 East 11th Avenue
Eugene, OR 97401-3584

Liberty Mutual Insurance
POB 9502
Dover NH 03821-9502

MARION COUNTY TAX COLLECTOR
PO BOX 2511
SALEM, OR 97308-2511

Mackey Porth & Unrein
864 Promontory PI SE/ PO 3200
Salem, OR 97302-0200

Marc Nelson Oil Products
POB 7135
Salem, OR 97303-0024

Marion County Assessor's Office
C/O Tom Rohlfing
POB 14500
Salem, OR 97309-5036

Marion County Circuit Court
100 High Street NE
Salem, OR 97301-3640

McMinnville Gas
1384 NE Hwy 99W
McMinnville, OR 97128-2797

Metal Works, Inc.
POB 939
Spencer, IA 51301-0939

Mt Angel Telephone Company
PO Box 200
Mt Angel, OR 97362-0200

ODR Bkcy
955 Center St NE
Salem OR 97301-2555

Optima Steel Holdings C/O Eulerhermes
1a Rockland Park Ave
Tappan, NY 10983

Oregon Business Development Corporation
775 Summer St NE #200
Salem, OR 97301-1280

Oxbow
600 S. 7th Street
Louisville, KY 40203-1968

PGE
POB 4438
Portland, OR 97208-4438

SUZANNE C PICKGROBE
620 SW Main St., Suite 313
Portland, OR 97205-3026

Penske
POB 7429
Pasadena, CA 91109-7429

Penske Truck Leasing Co., L.P.
Andrew J. Flame
Drinker Biddle & Reath LLP
One Logan Square, Ste. 2000
Philadelphia, PA 19103-6996

Pitney Bowes Global Financial Services LLC
27 Waterview Drive
Shelton, CT 06484-4301

Protec
720 NE Flanders
Portland, OR 97232-2763

RF Factor
APEC & Service Partner
8904 Kimmie Rd SW
Tumwater, WA 98512-7641

CRAIG G RUSSILLO
1211 SW 5th Ave #1600-1900
Portland, OR 97204-3795

Recovery Management Systems Corporation
25 SE 2nd Ave #1120
Miami, FL 33131-1605

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Alex Rhoten
Coldwell Banker Commercial
960 Liberty St SE #250
Salem, OR 97302-4197

BRANDY A SARGENT
900 SW 5th Ave #2600
Portland, OR 97204-1229

SBA - Portland District Office
620 SW Main St #313
Portland, OR 97205-3026

TARA J SCHLEICHER
121 SW Morrison St #600
Portland, OR 97204-3136

NATHAN FREDERICK JONES SMITH
Malcolm & Cisneros, A Law Corporation
2112 Business Center Drive
Irvine, CA 92612-7137

Schwabe Williamson & Wyatt PC
Attorneys At Law
360 SW Bond St., Suite 400
Bend, OR 97702-3540

Service Partners LLC
c/o John C. Baker
P. O. Box 467
Marysville, WA 98270-0467

Service Partners LLC
P.O. Box 467
Marysville, WA 98270-0467

State Board of Equalization
Special Ops Branch, MIC:55
POB 942879
Sacramento, CA 94279-0055

State of Oregon, Business Development Deptme
775 Summer St. NE Suite 200
Salem, OR 97301-1280

Superior Plus
4225 W Glenrosa Ave
Phoenix, AZ 85019-3308

TED A TROUTMAN
5075 SW Griffith Dr.
STE 220
Beaverton, OR 97005-3045

Thomas E. Perez, US Secretary of Labor,
US Dept of Labor ATTN Judy Owen
Employee Benefits Security Admin.
300 5th Ave #1110
Seattle, WA 98104-0002

Toyota Lift Northwest
POB 4100
Portland, OR 97208-4100

U.S. Small Business Administration
801 Tom Martin Drive, Ste 120
Birmingham, AL 35211-6424

US Trustee, Eugene
405 E 8th Ave #1100
Eugene, OR 97401-2728

Valley Development Initiatives
C/O Truman A. Stone, RA
100 High Street SE, Suite 200
Salem, OR 97301-3636

Valley Development Initiatives
c/o John D. Albert
PO Box 2247
Salem, OR 97308-2247

Valley Rolling Corporation
3071 Schmidt Ln. NE
Hubbard, OR 97032-9806

CAROLYN G WADE
Dept of Justice/Civil Enforce/Recovery
1162 Court St NE
Salem, OR 97301-4096

PATRICK W WADE
POB 1475
Eugene, OR 97440-1475

West Coast Metals
c/o Erik Hallenbeck
27292 Calle Arroyo, Suite A
San Juan Capistrano, CA 92675-6759

West Coast Metals
c/o Erik Hallenbeck
27292 Calley Arroyo, Suite A
San Juan Capistrano, CA 92675-6759

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank Of America
POB 982235
El Paso, TX 79998-2235

Discover Financial Services
PO Box 15316
Wilmington, DE 19850

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)KeyBank National Association

(u)KeyBank,N.A.

(d)Mt. Angel Telephone Company
POB 200
Mt. Angel, OR 97362-0200

(u)Oregon Business Development Department

(u)Penske Truck Leasing Co., L.P.

(d)SBA - Portland District Office
620 SW Main St #313
Portland OR 97205-3026

(d)KEITH A TREFRY
Paine Hamblen LLP
717 W Sprague Ave Ste 1200
Spokane, WA 99201-3905

(u)United States of America/ IRS

(u)Valley Development Initiatives

End of Label Matrix
Mailable recipients 95
Bypassed recipients 9
Total 104